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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JENNAFER AYCOCK,

Plaintiff,

vs.

**CITIBANK, N.A.; EXPERIAN
INFORMATION SOLUTIONS, INC.;
TRANS UNION, LLC,**

Defendants.

Case No.: 2:23-cv-00293-APG-VCF

**Joint ~~Proposed~~ Discovery Plan and
Scheduling Order Submitted In
Compliance With LR 26-1(b)**

Plaintiff Jennafer Aycock ("Plaintiff") and Defendant Experian Information Solutions, Inc. ("Experian") and Citibank, N.A. ("Citi") (both collectively "Defendant") (jointly as the "Parties"), by and through their respective counsel, hereby submit this proposed Joint Discovery Plan and Scheduling Order.

The Parties propose the following discovery plan and scheduling order:

~~PROPOSED~~ DISCOVERY PLAN

1. **Discovery Cut-Off Date:** Defendant Experian filed its Answer on March 30, 2023 (ECF No. 8) while Defendant Citi filed its answer on April 21, 2023 (ECF No. 12). To allow for all discovery to take place, the proposed cut-off date for

1 discovery shall be **September 26, 2023**, 180 days from the date of Defendant
2 Experian's Answer.

3 2. **Amending the Pleadings and Adding Parties**: All motions to amend
4 the pleadings or to add parties shall be filed no later than **June 28, 2023**, 90 days
5 prior to the proposed close of discovery.

6 3. **Fed.R.Civ.P. 26(a)(2) Disclosures (Experts)**: Disclosures and reports
7 concerning experts shall be made by **July 28, 2023**, 60 days before the proposed
8 discovery cut-off date. Disclosures and reports concerning rebuttal experts shall be
9 made by **August 28, 2023**, 30 days after the initial disclosure of experts.

10 4. **Dispositive Motions**: The date for filing dispositive motions shall not be
11 later than **October 26, 2023**, 30 days after the proposed close of discovery. In the
12 event that the discovery period is extended from the discovery cut-off date set forth in
13 this proposed Discovery Plan and Scheduling Order, the date for filing dispositive
14 motions shall be extended to be not later than 30 days from the subsequent discovery
15 cut-off date.

16 5. **Pretrial Order**: The date for filing the joint pretrial order shall not be
17 later than **November 27, 2023**, 30 days after the cut-off date for filing dispositive
18 motions. In the event that dispositive motions are filed, the date for filing the joint
19 pretrial order shall be suspended until 30 days after decision on the dispositive
20 motions or until further order of the court. In the further event that the discovery
21 period is extended from the discovery cut-off date set forth in this Discovery Plan and
22 Scheduling Order, the date for filing the joint pretrial order shall be extended in
23 accordance with the time periods set forth in this paragraph.

24 6. **Pretrial Disclosures**: The disclosures required by Fed. R. Civ. P.
25 26(a)(3), and any objections thereto, shall be included in the joint pretrial order.

26 7. **Extensions or Modifications of the Discovery Plan and Scheduling**
27 **Order**: Applications to extend any date set by the discovery plan, scheduling order,
28 or other order must comply with the Local Rules.

1 8. **Initial Disclosures:** The Parties shall make initial disclosures on or
2 before **May 15, 2023**, to the extent that initial disclosures have not yet been made.

3 9. **Protective Order:** The Parties may seek to enter a stipulated protective
4 order pursuant to Rule 26(c) prior to producing any confidential documents.

5 10. **Electronic Service:** The Parties agree that electronic service of
6 discovery documents may be used. For electronic service to be effective as to
7 Experian, in addition to electronic service to all counsel of record, electronic service
8 shall also be sent to Amy Reams at areams@nblawnv.com unless otherwise amended
9 in writing by Experian.

10 11. **Alternative Dispute Resolution Certification:** The Parties certify that
11 they met and conferred about the possibility of using alternative dispute-resolution
12 processes including mediation, arbitration, and early neutral evaluation.

13 The Parties are generally agreeable to the Alternative Dispute Resolution
14 through, including but not limited to, mediation and early neutral evaluation after an
15 initial period of discovery.

16 12. **Alternative Forms of Case Disposition Certification:** The Parties
17 certify that they considered consent to trial by a magistrate judge under 28 U.S.C. §
18 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order
19 2013-01). The parties have not reached any stipulations at this stage.

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13. **Electronic Evidence**: The Parties certify that they discussed the possibility of producing documents in electronic format, which could then facilitate presenting electronic evidence to jurors for the purposes of jury deliberations at trial. The parties have not reached any stipulations at this stage.

DATED this 12th day of May 2023.

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SCHEDULING ORDER

The above-set stipulated Discovery Plan of the Parties shall be the Scheduling Order for this action pursuant to Federal Rule of Civil Procedure 16(b) and Local Rule 16-1.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 5-19-2023

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on May 12, 2023, the foregoing JOINT PROPOSED DISCOVERY PLAN AND SCHEDULING ORDER was served via CM/ECF to all parties appearing in this case.

Respectfully submitted,

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